

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RIP MANAGEMENT GROUP CORP.,) Civil Act NO. 3:11-cv-83
)
Plaintiff,) The Honorable Kim R. Gibson
v.)
)
DISCOVER PROPERTY & CASUALTY)
INSURANCE COMPANY,)
)
Defendant and Third)
Party Plaintiff,)
v.)
)
THE FRANK GATES SERVICE)
COMPANY and FRONTIER ADJUSTERS,)
INC., and RALPH MASON d/b/a)
FRONTIER ADJUSTERS d/b/a FRONTIER)
ADJUSTERS OF BUTLER/KITTANNING)
)
Third-Party Defendants.)

MOTION FOR WITHDRAWAL OF APPEARANCE

AND NOW, come John B. Cromer, Esquire and Katherine M. Wrenshall, Esquire and Burns White, LLC, who hereby file the following Motion for Withdrawal of Appearance, stating and averring as follows:

1. In accordance with the United States District Court for the Western District of Pennsylvania Local Rule 83.2., the undersigned are hereby filing this Motion for the withdrawal of their appearance as counsel for Third-Party Defendant, Frontier Adjusters, Inc., and Ralph Mason d/b/a Frontier Adjusters d/b/a Frontier Adjusters of Butler/Kittanning.
2. Third-Party Defendant, Frontier Adjusters, Inc., and Ralph Mason d/b/a Frontier Adjusters d/b/a Frontier Adjusters of Butler/Kittanning and the undersigned counsel have

mutually agreed to the withdrawal and Frontier Adjusters and Mr. Mason have already retained new counsel whose appearance has been entered.

3. In accordance with Local Rule 83.2., it is respectfully requested that this Honorable Court grant this Motion for Withdrawal of Appearance.

WHEREFORE, John B. Cromer, Esquire and Katherine M. Wrenshall, Esquire and Burns White, LLC, hereby request this Honorable Court grant this Motion for Withdrawal of Appearance in the form of the proposed order attached hereto.

Respectfully submitted,

/s/ John B. Cromer

John B. Cromer, Esquire
PA ID No. 66773

Katherine M. Wrenshall, Esquire
PA No. 311931

BURNS WHITE LLC
Four Northshore Center
106 Isabella Street
Pittsburgh, PA 15212
412-995-3136

*Counsel for Third-Party Defendant,
Frontier Adjusters, Inc., and Ralph Mason d/b/a
Frontier Adjusters d/b/a Frontier Adjusters of
Butler/Kittanning*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **MOTION FOR WITHDRAWAL OF APPEARANCE** has been filed through the ECF system and will be electronically served on all counsel of record who are registered participants:

Douglas R. Widin, Esquire
Jay M. Levin, Esquire
Robert H. Owen, Esquire
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Gulf Tower, Suite 2400
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Respectfully submitted,

/s/ John B. Cromer

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*Counsel for Third-Party Defendant,
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ADJUSTERS OF BUTLER/KITTANNING)	
)	
Third-Party Defendants.)	

ORDER OF COURT

AND NOW, this _____ day of _____, 2013, it is hereby ORDERED,
JUDGED AND DECREED that the Motion for Withdrawal of Appearance is granted. John B.
Cromer, Esquire and Katherine M. Wrenshall, Esquire and Burns White, LLC are hereby
removed as counsel for Third-Party Defendant, Frontier Adjusters, Inc., and Ralph Mason d/b/a
Frontier Adjusters d/b/a Frontier Adjusters of Butler/Kittanning.

BY THE COURT,

J.